

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
2 A Limited Liability Partnership
3 Including Professional Corporations
4 ORI KATZ, Cal. Bar No. 209561
5 okatz@sheppardmullin.com
6 MICHAEL M. LAUTER, Cal. Bar No. 246048
7 mlauter@sheppardmullin.com
8 Four Embarcadero Center, 17th Floor
9 San Francisco, California 94111-4109
10 Telephone: 415.434.9100
11 Facsimile: 415.434.3947

12
13 Counsel for Creditor, Citigroup Financial
14 Products Inc.

15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

13 In re: Case No. 19-30088 (DM)

14 PG&E Corporation Chapter 11

15 -and- (Lead Case)

16 Pacific Gas and Electric Company, (Jointly Administered)

17 Debtors

18 Affects PG&E Corporation
19 Affects Pacific Gas and Electric
20 Company
21 Affects Both Debtors

22 * All papers shall be filed in the Lead
Case, No. 19-30088

**NOTICE OF CONTINUED
PERFECTION OF LIEN PURSUANT
TO 11 U.S.C. § 546(b)(2)**

Citigroup Financial Products Inc. (“Citigroup”), as assignee of Campos EPC, LLC (“Campos”), by and through its undersigned counsel, hereby gives notice of continued perfection of its mechanics lien under 11 U.S.C. § 54(b)(2), as follows:

1. Campos is a counterparty to certain contracts, work orders, and related agreements (the “Agreements”) for engineering design and construction work related to Pacific Gas and Electric Company’s utility services in California. Pursuant to work performed by Campos pursuant to the Agreements, Campos is owed no less than \$181,015.85, plus applicable interest.

2. Pacific Gas and Electric Company (the “Debtor”) filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code on January 29, 2019 (the “Petition Date”).

3. Campos properly perfected its mechanics lien under California Civil Code §§ 8400, *et. seq.* by timely recording its Mechanics Lien (Claim of Lien) in the Official Records of the County of Yolo on March 27, 2019, as more fully described in its Mechanics Lien, a true copy of which attached hereto as **Exhibit A**.

4. Pursuant to California Code § 8460, an action to enforce a lien must be commenced within 90 days after recordation of the claim of lien. However, due to the automatic stay set forth in 11 U.S.C. § 362, Citigroup is precluded from filing a state court action to enforce the mechanics lien. Pursuant to 11 U.S.C. 546(b)(2), when applicable law requires seizure of property or commencement of an action to perfect, maintain, or continue the perfection of an interest in property, and the property has not been seized or an action has not been commenced before the bankruptcy petition date, then the claimant shall instead give notice within the time fixed by law for seizing the property or commencing an action.

5. Accordingly, Citigroup hereby provides notice of its right as a perfected lien holder pursuant to California's mechanics lien law.

6. This Notice shall not be construed as an admission that such filing is required or to the necessity of recording, commencement or seizure. Additionally,

1 Citigroup gives notice that it has, or may be entitled to, additional mechanics' liens rights
2 to properties owned by the Debtor as they become due and owing according to prepetition
3 contracts with the Debtor for improvements of real property. This Notice shall preserve
4 and continue to preserved any and all of Citigroup's rights as to the Bankruptcy Code and
5 the California Civil Code.

6 7. Citigroup expressly reserves its right to seek relief from the automatic stay to
7
8
8
foreclose the mechanics lien and/or a waiver of any other rights or defenses. Citigroup
further reserves the right to amend or supplement this notice.

10 || Dated: June 13, 2019

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By /s/ Michael Lauter
ORI KATZ
MICHAEL LAUTER

Counsel for Citigroup Financial Products Inc.

EXHIBIT A

Recording requested by (name):
Robert Cohen

When recorded, mail to (name and address):
Robert Cohen

1401 Blake Street

Denver, CO 80202

CONFORMED COPY
NOT COMPARED
WITH ORIGINAL



YOLO Recorder's Office
Jesse Salinas, County Recorder
DOC- 2019-0006013-00

Check Number 202095

REQD BY PARASEC ROBERT COHEN

Wednesday, MAR 27, 2019 13:40:00

Ttl Pd \$111.00 Rcpt # 0001340505

FRT/R9/1-5

Recorder's Use Only

CLAIM OF MECHANICS LIEN

(Cal. Civ. Code § 8416)

Declaration of Exemption From Gov't Code § 27388.1 Fee

Transfer is exempt from fee per GC § 27388.1(a)(2):
 recorded concurrently "in connection with" transfer subject to DTT
 recorded concurrently "in connection with" a transfer of residential dwelling to an owner-occupier
 Transfer is exempt from fee per GC 27388.1(a)(1):
 Fee cap of \$225.00 reached Not related to real property

1. Campos EPC, LLC, a Colorado limited liability company ("claimant") claims a mechanics lien for the labor or services or equipment or materials described in paragraph 2, furnished for a work of improvement on that certain real property located in the County of Yolo, State of California, and more particularly described as (address and/or sufficient description):

PG&E Asset PG&E Gas Transmission Line L-400 at Buckey PLS Station Mile Point 233.87. Buckeye is located in Yolo County, north of Sacramento, approximately six miles west of the town of Dunnigan. Refer to Operating Diagram 082472 rev 18. The station proximity to neighboring stations is delineated on Operating Map 384504 and 484001. The Lat/Long of the station is 38.88658°-122.07182°. Projects I-203A and S-648

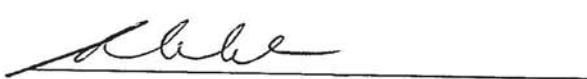
2. After deducting all just credits and offsets, the sum of \$181,015.85, together with interest at the rate of 5.25% per annum from March 22, 2019 (date when balance became due), is due claimant for the following labor, materials, services, or equipment: See Attachment A

3. Claimant furnished the labor or services or equipment or materials, at the request of Pacific Gas and Electric Company. (employer, person, or entity to whom labor, materials, services, or equipment were furnished).

4. The name and address of the owner or reputed owner of the real property is/are: Pacific Gas and Electric Company, P.O. Box 997300, Sacramento, CA 95899-7300

5. Claimant's address is Campos EPC, LLC, 1401 Blake Street, Denver, CO 80202

Dated 3/11/2019


(Signature) Robert Cohen

VERIFICATION

I, Robert Cohen, am the: partner of claimant on the foregoing claim of mechanics lien and am authorized to make this verification for and on its behalf. I have read the foregoing claim of mechanics lien and know the contents of the claim of mechanics lien to be true of my own knowledge.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated 3/33/2019



(Signature) Robert Cohen

ATTACHMENT A

DESCRIPTION OF WORK / SERVICES PERFORMED

Provided engineering, survey, field engineering, mapping, site investigation, geotechnical borings, and mapping for projects I-203A and S-648, .

NOTICE OF MECHANICS LIEN CLAIM

ATTENTION!

Upon the recording of the enclosed MECHANICS LIEN with the county recorder's office of the county where the property is located, your property is subject to the filing of a legal action seeking a court-ordered foreclosure sale of the real property on which the lien has been recorded. That legal action must be filed with the court no later than 90 days after the date the mechanics lien is recorded.

The party identified in the enclosed mechanics lien may have provided labor or materials for improvements to your property and may not have been paid for these items. You are receiving this notice because it is a required step in filing a mechanics lien foreclosure action against your property. The foreclosure action will seek to pay for unpaid labor, materials, or improvements provided to your property. This may affect your ability to borrow against, refinance, or sell the property until the mechanics lien is released.

BECAUSE THE LIEN AFFECTS YOUR PROPERTY, YOU MAY WISH TO SPEAK WITH YOUR CONTRACTOR IMMEDIATELY, OR CONTACT AN ATTORNEY, OR FOR MORE INFORMATION ON MECHANICS LIENS GO TO THE CONTRACTORS' STATE LICENSE BOARD WEB SITE AT www.csib.ca.gov.

PROOF OF SERVICE AFFIDAVIT
California Civil Code section 8416

Failure to serve the Mechanic's Lien and Notice of Mechanic's Lien on the owner, or alternatively if the owner cannot be served on the lender or direct contractor, shall cause the Mechanic's Lien to be unenforceable as a matter of law (Civil Code Section 8024(d)). Service of the Mechanic's Lien and Notice of Mechanic's Lien must be by (1) registered mail, (2) certified mail, or (3) first-class mail evidenced by a certificate of mailing, postage prepaid, and to a residence or business address for the owner, lender or contractor. Further, a Proof of Service Affidavit (below) must be completed and signed by the person serving the Mechanic's Lien and Notice of Mechanic's Lien. This page should be completed (either one of the sections below) and recorded with the County Recorder along with the Mechanic's Lien and Notice of Mechanic's Lien.

PROOF OF SERVICE AFFIDAVIT (ON OWNER)
California Civil Code section 8416(a)(7) and (c)(1)

I, Robert Cohen _____ (name), declare that I served a copy of this Mechanic's Lien and Notice of Mechanic's Lien by registered mail, certified mail, or first-class mail evidenced by a certificate of mailing, postage prepaid, addressed as follows to the owner(s) or reputed owner(s) of the property:

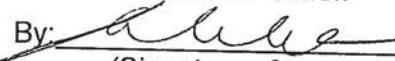
Company/Person Served: PG&E / Linda Y.H. Cheng _____

Title or capacity of person served (if appropriate): Registered Agent _____

Service address: 77 Beale Street, 24th floor, San Francisco CA 94105. Said service address is the owner's residence, place of business, or address showed by the building permit on file with the permitting authority for the work.

Executed on March 13, 20 19 (date) at San Ramon (city), Costa County _____
(county), California.

Robert Cohen

By: 

(Signature of person making service) _____

ALTERNATE PROOF OF SERVICE AFFIDAVIT (ON LENDER OR DIRECT CONTRACTOR)

California Civil Code Section 8416(a)(7) and (c)(2)

I, _____ (name), declare that the owner or reputed owner cannot be served with a copy of this Mechanic's Lien and Notice of Mechanic's Lien by registered mail, certified mail, or first-class mail. Pursuant to California civil Code section 8416(c)(2), I served a copy of this Mechanic's Lien and Notice of Mechanic's Lien by registered mail, certified mail, or first-class mail evidenced by a certificate of mailing, postage prepaid, addressed as follows to the construction lender or direct contractor as follows:

Company/Person Served: _____

Title or capacity of person served (if appropriate): _____

Service address: _____

Executed on _____, 20 _____ (date) at _____ (city), _____
(county), California.

By: _____
(Signature of person making service) _____